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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

CHASOM BROWN, MARIA NGUYEN,  
and WILLIAM BYATT, individually and  
on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC and ALPHABET INC.,

Defendants.

Case No. 5:20-cv-03664-LHK

**JOINT STIPULATION TO EXTEND  
TIME TO RESPOND TO COMPLAINT  
(CIVIL L.R. 6-1(A)) AND JOINT  
STIPULATION REQUEST FOR ORDER  
EXTENDING RULE 12 BRIEFING  
(CIVIL L.R. 6-2)**

Judge: Hon. Lucy H. Koh

CASE NO. 5:20-cv-03664-LHK

JOINT STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT (CIVIL L.R. 6-1(A)) AND JOINT  
STIPULATION REQUEST FOR ORDER EXTENDING RULE 12 BRIEFING (CIVIL L.R. 6-2)

Pursuant to Local Rule 6-1(a), IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Chasom Brown, Maria Nguyen, and William Byatt (“Plaintiffs”) and Defendants Google LLC and Alphabet Inc. (“Google,” and collectively with Plaintiffs, the “Parties”), by and through their respective counsel of record, to extend by 45 days the deadline for answering or responding to the complaint from July 6, 2020 (21 days after the date Google was served on June 12, 2020) to August 20, 2020. The change will not alter the date of any event or any deadline already fixed by Court order.

Further, pursuant to N.D. Cal. Civ. Local. R. 6-2, by joint stipulation, the Parties, by and through their respective counsel of record, respectfully request that the Court modify the time and deadlines for briefing related to Google’s forthcoming Rule 12 motion. Due to the COVID-19 pandemic and substantial logistical challenges associated with coronavirus mitigation measures put into place throughout the United States, the Parties, after meeting and conferring, have agreed to jointly propose a modification to the briefing deadlines provided by Fed. R. Civ. P. 12(a) and Civ. Local R. 7-3 to extend Plaintiffs’ deadline to file a response to any Rule 12 motion by 16 days, and to extend Google’s deadline to file a Reply by 14 days. The current and modified dates are reflected in the table below:

	<b>Current Date</b>	<b>Modified Date</b>
Google Deadline to Answer or Respond	July 6, 2020	August 20, 2020 (45-day extension)
Plaintiffs’ Deadline to Respond to any Rule 12 Motion	September 3, 2020	September 21, 2020 (16-day extension)
Google Reply Deadline	September 28, 2020	October 13, 2020 (14-day extension)

1 DATED: July 2, 2020

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3 By /s/ Diane M. Doolittle

4 Diane M. Doolittle

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17 *Attorneys for Defendants*  
18 Google LLC and Alphabet Inc.

1 DATED: July 2, 2020

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19 *Attorneys for Plaintiffs*

**DECLARATION OF DIANE M. DOOLITTLE**

I, Diane M. Doolittle, hereby declare as follows:

1. I am a member of the bar of the State of California and a partner at Quinn Emanuel Urquhart & Sullivan, LLP. I am an attorney of record for the Defendants Google LLC and Alphabet Inc. ("Google") in this matter. I submit this declaration in support of the foregoing joint stipulation request, pursuant to N.D. Cal. Civ. Local. R. 6-2.

2. Due to the COVID-19 pandemic and various substantial logistical challenges associated with coronavirus mitigation measures put into place throughout the United States, the parties, after meeting and conferring, have agreed to stipulate to an extension of time for answering or responding to the complaint and for briefing related to Google's forthcoming motion to dismiss, such that Google's deadline for filing an answer or Rule 12 motion would be August 20, 2020; Plaintiffs' deadline for responding to any Rule 12 motion would be September 21, 2020; and Google's deadline for filing a reply to such response would be October 13, 2020.

3. To my knowledge, there has been no previous time modification in the case by stipulation or Court order and the requested time modifications would not affect other aspects of the schedule for this case.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 2, 2020 in Redwood Shores, CA.

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Diane M. Doolittle  
Diane M. Doolittle

*Attorneys for Defendants*  
Google LLC and Alphabet Inc.

**SIGNATURE ATTESTATION**

The e-filing attorney hereby attests that concurrence in the content of the joint stipulation and authorization to file the joint stipulation has been obtained from the other signatory indicated by a conformed signature (/s/) within the foregoing e-filed document.

DATED: July 2, 2020

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

By /s/ Diane M. Doolittle  
Diane M. Doolittle

*Attorneys for Defendants*  
Google LLC and Alphabet Inc.